

Brian J. Ramsey, Esquire  
 MILLENNIUM LEGAL LLC  
 5258 South Eastern Avenue, Suite 202  
 Las Vegas Nevada 89119  
 (702) 936-4830 (Tel.)  
 (702) 472-9174 (Fax.)  
 brian@millenniumlegal.com  
*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA  
 LAS VEGAS, NEVADA**

**ARACELY PACHECO MORAN,**  
**Plaintiff,**  
  
**v.**  
  
**CHAD WOLF, et al.,**  
**Defendants.**

Case File No.: 2:20-cv-01316-JAD-EJY

Immigration File No.: A 071-572-344

**Stipulation and Order for Extension of Time  
 (First Request)**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Petitioner and Respondents, through undersigned counsel, stipulate and request that the Court approve a 10-day extension of time, from October 19, 2020 to October 29, 2020, for Plaintiff to file her opposition to Defendants' Motion to Dismiss Plaintiff's Amended Complaint for Injunctive and Mandamus Relief (ECF No. 26) ("Defendants' Motion to Dismiss").

Plaintiff's counsel has been hamstrung by the extended medical leave of his only paralegal, which has affected counsel's ability to respond to multiple filings due during the first weeks of October. The deadlines in these other matters require appropriate and prompt response. Under the circumstances, good cause exists to extend the time for Plaintiff to file her opposition to Defendants' Motion to Dismiss. *See* Fed. R. Civ. P. 6(b)(1)(A) ("When an act may or must be done within a specified time, the court may, for *good cause*, extend the time...with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires[.]") (emphasis added).

1 This is Plaintiff's first request for an extension of time. This stipulated request is filed in  
2 good faith and not for the purpose of undue delay.  
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4 Respectfully submitted this 26th day of October 2020.

5 NICHOLAS A. TRUTANICH  
United States Attorney

MILLENNIUM LEGAL LLC

6 /s/ Holly A. Vance

/s/ Brian J. Ramsey

7 HOLLY A. VANCE  
Assistant United States Attorney  
8 400 South Virginia Street, Suite 900  
Reno, Nevada 89501  
9 Attorney for Respondents

BRIAN J. RAMSEY, ESQ.  
MILLENNIUM LEGAL LLC  
Attorney for Plaintiff

10 IT IS SO ORDERED:

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14 UNITED STATES MAGISTRATE JUDGE

15 Dated: October 26, 2020  
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